

## **REMARKS**

Claims 1 – 48 are pending in the application. Claims 1 – 16, 19 – 27, 29 – 35, 38 – 43 and 48 have been rejected. Claims 17, 18, 28, 36, 37 and 44 – 47 have been objected to. Applicants have amended Claims 21-23, 28 and 42 and have canceled Claim 48. Applicants respectfully traverse the Examiner's rejections and request reconsideration and full allowance of all pending claims.

### **1. Claim Rejections Under Section 112.**

Applicants have amended Claims 21-23 to address the informalities raised by the Examiner and respectfully request withdrawal of the rejection of Claim 22.

### **2. Claim Rejections Under Section 102.**

Independent Claims 1 and 29 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,963,635 issued to Szlam et al.

Szlam discloses a single "switch" 13 that places outbound calls and provides the outbound calls to agent workstations. Switch 13, described as a PBX, PABX, ACD, dialer, crosspoint switch or combination of these, also supports outbound calls with a modem server 17 to send e-mails and a facsimile server 18 to send faxes. (8:44-48 and 8:64-68)

Claim 1 recites, in part, "a plurality of dialing devices operable to receive a plurality of call records and to provide a plurality of telephone calls to one or more agents."

Claim 29 recites, in part, "transferring the queues to a plurality of dialing devices."

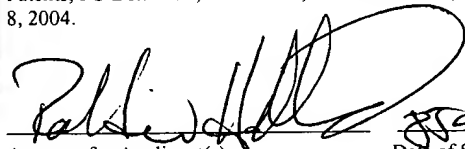
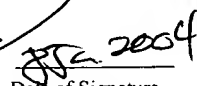
Applicants respectfully submit that Szlam cannot anticipate Claims 1 and 29 because Szlam fails to teach, disclose or suggest all elements recited by Claims 1 and 29. For instance, Szlam fails to teach disclose or suggest "a plurality of dialing devices operable to receive a plurality of call records and to provide a plurality of telephone calls to one or more agents" as recited by Claim 1. As another example, Szlam fails to teach, disclose or suggest "transferring the queues to a plurality of dialing devices" as recited by Claim 29. The Examiner's rejection



States on page 3 that modem server 17 and facsimile server 18 disclose the recited "plurality of dialing devices" limitation. Applicants respectfully refer the Examiner to the first sentence of column 9 of Szlam which states that "The facsimile server 18, the modem server 17 and the printers 19 are preferably connected to the telephone lines via the switch 13." Since the facsimile and modem servers of Szlam rely on a single dialer to place calls, the facsimile and modem servers fail to disclose Applicants' recited "plurality of dialers." Further, with respect to Claim 1, Applicants respectfully submit that Szlam fails to teach, disclose or suggest that the facsimile and modem servers provide any calls to agents. Accordingly, Applicants respectfully submit that Claims 1 and 29 are allowable, as are Claims 2-28 and 30-47 which depend from Claims 1 and 29 respectfully.

### CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Non-Fee Amendment, Commissioner for Patents, PO Box 1450, Alexandria, VA 22313-1450, on January 8, 2004.	
 Attorney for Applicant(s)	 Date of Signature

Respectfully submitted,



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